



FOX RIVER WATER RECLAMATION DISTRICT

RAYMOND STREET & PURIFY DRIVE / P.O. BOX 328, ELGIN, IL 60121-0328 / PH. (847) 742-2068 FAX (847) 742-0136

August 15, 2005

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AUG 18 2005

Ms. Amy Antonioli
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph - Suite 11-500
Chicago, Illinois 60601

STATE OF ILLINOIS
Pollution Control Board

RE: R2004-021 Radium WQS Proposal

PC#51

Dear Ms. Antonioli,

Please accept the attached sheets as a written public comment for the proposed changes to the Radium Water Quality Standard. These comments are presented on behalf of the Illinois Association of Wastewater Agencies' (IAWA) Water Quality Subcommittee.

Please contact me if you have any questions. I thank you for your time in consideration of these comments.

Sincerely,

Rick Manner, P.E.
IAWA Water Quality Subcommittee - Chairman

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ILLINOIS ASSOCIATION OF WASTEWATER AGENCIES'
WATER QUALITY SUBCOMMITTEE COMMENTS REGARDING PROPOSED
ADDITIONS AND REVISIONS TO RADIUM WATER QUALITY STANDARDS

From a water quality standpoint, there are literally millions of toxins that could be present in waterways that could, in some theoretical concentration, present a problem for some species in our state. The Illinois Pollution Control Board (IPCB) has appropriately chosen to save the taxpayers the expense of preparing a detailed study and associated rulemaking on each of these toxins.

Radium should be added to that list of pollutants that are not specifically regulated, by removing the current, unsupported, water quality standard, except where drinking water is at risk. Not having a limit for each of these toxins does not invite uncontrolled discharge of all of these pollutants. Similarly, removing radium from the list of explicitly-limited pollutants does not invite increased discharges.

If there were significant sources of radium, or significant affects of radium in the environment, radium would warrant the time and attention of a complex rule, one that balances risks, costs and benefits. That is not the case here. With radium in the picocuries per liter range, you have:

- one primary source (drinking water plants),
- one primary risk (human health from ingestion),
- one primary set of people paying for any solution (drinking water ratepayers), and
- no real environmental threat from the levels found in the source.

This calls for a reasonable limit that protects the drinking water consumers from a health standpoint, but also from a financial standpoint. Very simply and efficiently, the Illinois Environmental Protection Agency's (IEPA) original proposal does that. If it ever comes to pass that this simple analysis is no longer accurate, the IEPA is employed to bring this to the attention of the IPCB. Further action would be appropriate at that time.

Please recall that at the start of this process, IEPA was in the unenviable position of knowing that there was no technical basis for the current standard of 1 pCi/L for radium 226. Further, they correctly recognized that several drinking water supplies would either be in direct violation of the standard, or would put their wastewater treatment plant in violation of this water quality standard.

Unfortunately, 1 pCi/L is still the enforceable limit today. Inaction today will continue this situation, causing utilities facing the need to fix radium issues for their drinking water supply, to also spend even more money to come into compliance with a water quality standard that has no technical basis. It is appropriate to change the limit, because the public expects their money to be spent in efforts that actually improve the environment in a meaningful way.

IEPA's initial proposal was a laudable attempt to fix this problem. They performed an exhaustive search for data. They found no data, that meets United States Environmental Protection Agency (USEPA) standards, to support developing a standard to protect aquatic systems. They proposed to join USEPA in not having a numeric water quality standard for radium, for much of the state.

IEPA did decide to retain a locally applied standard, to protect those water bodies that are used as drinking water supplies. They proposed a 5 pCi/L standard for those waters, using the conservative assumption that a drinking water plant which must meet 5 pCi/L for their product, will not add any radium to the water. Lacking any other evidence, that is an appropriately conservative design.

In summary, IEPA proposed a standard that would address human ingestion of radium, the only demonstrable risk present. USEPA agrees that from an aquatic habitat standpoint, there are insufficient data to support either a limit significantly below or above that level (3.75 or 30 pCi/L). This implies that there would be a similar lack of data to support any particular number, from an aquatic habitat standpoint. USEPA also points out that any numerical limit above 5 pCi/L would be less protective of drinking water supplies. IEPA's original proposal addresses these issues.

Because it addresses all of the meaningful concerns for radium in the waters of Illinois, the IPCB should adopt the original proposal from IEPA.

Even with the relief provided by the IPCB's proposed rule of 3.75 pCi/L, with 30 pCi/L for the first mile downstream of some wastewater plants, there will be both drinking water suppliers and wastewater treatment plants that cause a violation of the water quality standard. Maintaining this set of limits results in some utilities being out of compliance with a limit, for which IEPA and USEPA agree there is insufficient support.

If the IPCB requires any instantaneous limit that is less than 30 pCi/L of total radium, it assures that some systems will be in violation of it from time to time. If there were a demonstrable risk of harm to the environment, it would be appropriate to impose such a limit and the financial burden of compliance would be met by the sources of radium. That is not the case here, so the financial burden is excessive.



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FAX NO. (847) 742-0193

TO: Ms. Amy Antoniolli

COMPANY: IPCB

FROM: RICK MANNER

DATE: 8-15-2005

TIME: _____

RE: R2004-021 RADIUM WQS

REMARKS: _____

THIS IS PAGE 1 OF 4 PAGES BEING TRANSMITTED. IF ANY PROBLEMS OCCUR, PLEASE CALL (847) 742-2068.

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